

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FARAH JEAN FRANCOIS,

Plaintiff,

Case No. 1:22-cv-4447

- against -

VICTORY AUTO GROUP LLC d/b/a VICTORY
MITSUBISHI and SPARTAN AUTO GROUP LLC
d/b/a VICTORY MITSUBISHI, JOHN DOES 1 - 6,
and PHILIP ARGYROPOULOS

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that, VICTORY AUTO GROUP LLC d/b/a VICTORY
MITSUBISHI (“Victory Auto”), SPARTAN AUTO GROUP LLC d/b/a VICTORY
MITSUBISHI (“Spartan Auto”) and PHILIP ARGYROPOULOS (“Argyropoulos”) (collectively
“Defendants”), upon the accompanying Memorandum of Law in Support of Defendants’ Motion to
Dismiss, hereby move this Court, before the Hon. Jed S. Rakoff, at the United States Courthouse
located at 500 Pearl Street, New York, New York, Courtroom 14-B, on September 15, 2022, at
4:30pm for an Order dismissing Counts II, III and IV of Plaintiff’s Complaint pursuant to Federal
Rule of Civil Procedure 12(c).

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Dated: New York, New York
August 9, 2022

Yours, etc.
NICHOLAS GOODMAN & ASSOCIATES, PLLC

BY: 

H. Nicholas Goodman
Attorneys for Defendants
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d/b/a VICTORY MITSUBISHI,
SPARTAN AUTO GROUP LLC
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Via ECF

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